



Your business  
is our business.

REDACTED FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200  
Greenbelt, Maryland 20770  
phone: 301-459-7590, fax: 301-577-5575  
internet: [www.jsitel.com](http://www.jsitel.com), e-mail: [jsi@jsitel.com](mailto:jsi@jsitel.com)

June 29, 2017

**Via Hand Delivery**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 14-58  
2017 ETC Annual Report of West Side Telephone Company-PA  
Study Area Code 170277**

Dear Ms. Dortch:

On behalf of West Side Telephone Company ("Company"), JSI files the attached confidential version of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.<sup>1</sup> Company seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.<sup>2</sup> The redacted version is being filed this date via the FCC's Electronic Comment Filing System.

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

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<sup>1</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>2</sup> *Connect America Fund et al.*, WC Docket Nos. 10-90 and 14-58, Protective Order, DA 16-296 rel. March 22, 2016 (Protective Order). 47 C.F.R. § 54.313(f)(2).

<010> Study Area Code 170277

<015> Study Area Name WEST SIDE TEL CO-PA

<020> Program Year 2018

<030> Contact Name: Person USAC should contact  
with questions about this data Lori Hindman

<035> Contact Telephone Number: 3049838611 ext.  
Number of the person identified in data line <030>

<039> Contact Email Address: lhindman@westsidetel.com  
Email of the person identified in data line <030>

Form Type 54.313 and 54.422

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**(200) Service Outage Reporting (Voice)**

## Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	170277
<015>	Study Area Name	WEST SIDE TEL CO-PA
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Lori Hindman
<035>	Contact Telephone Number - Number of person identified in data line <030>	3049838611 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lhindman@westsidetel.com

<210> For the prior calendar year, were there any reportable voice service outages? No

[illegible]

<b>(300) Unfulfilled Service Request</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	170277
<015>	Study Area Name	WEST SIDE TEL CO-PA
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Lori Hindman
<035>	Contact Telephone Number - Number of person identified in data line <030>	3049838611 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lhindman@westsidetel.com

<300> Unfulfilled service request (voice)

0
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<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband)

0
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<330> Detail on attempts (broadband)

Name of Attached Document

(400) Number of Complaints per 1,000 customers Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	170277
<015>	Study Area Name	WEST SIDE TEL CO-PA
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Lori Hindman
<035>	Contact Telephone Number - Number of person identified in data line <030>	3049838611 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lhindman@westsidetel.com
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed voice	
<410>	Complaints per 1000 customers for fixed voice	0 . 0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed broadband	
<440>	Complaints per 1000 customers for fixed broadband	0 . 0
<450>	Complaints per 1000 customers for mobile broadband	

<b>(500) Compliance With Service Quality Standards and Consumer Protection Rules</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	170277
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<035>	Contact Telephone Number - Number of person identified in data line <030>	3049838611 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lhindman@westsidetel.com
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
170277pa510.pdf		
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	
<515>	Certify compliance with applicable minimum service standards	

<b>(600) Functionality in Emergency Situations Data Collection Form</b>	<b>REDACTED FOR PUBLIC INSPECTION</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<039>	Contact Email Address - Email Address of person identified in data line <030>	lhindman@westsidetel.com
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	170277pa610.pdf

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**(700) Price Offerings including Voice Rate Data  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	170277
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<015>	Study Area Name	WEST SIDE TEL CO-PA
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<020>	Program Year	2018
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<030> Contact Name - Person USAC should contact regarding this data Lori Hindman

3049838611 ext.

<035> Contact Telephone Number - Number of person identified in data line <030>

<039> Contact Email Address - Email Address of person identified in data line <030> lhindman@westsidetel.com

<701> Residential Local Service Charge Effective Date

1/1/2017

<702> Single State-wide Residential Local Service Charge

[illegible]



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<b>(710) Broadband Price Offerings</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<039>	Contact Email Address - Email Address of person identified in data line <030>	lhindman@westsidetel.com

[illegible]

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<b>(800) Operating Companies</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<035>	Contact Telephone Number - Number of person identified in data line <030>	3049838611 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lhindman@westsidetel.com
<810>	Reporting Carrier	West Side Telephone Company
<811>	Holding Company	TelAtlantic, Inc.
<812>	Operating Company	West Side Telephone Company

[illegible]

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<900> Does the filing entity offer tribal land services? (Y/N)

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If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

[illegible]

**(1000) Voice and Broadband Service Rate Comparability  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	170277
<015>	Study Area Name	WEST SIDE TEL CO-PA
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<039>	Contact Email Address - Email Address of person identified in data line <030>	lhindman@westsidetel.com

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance

\_\_\_\_\_  
Name of Attached Document

<1020> Broadband comparability certification

Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance

\_\_\_\_\_  
Name of Attached Document

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**(1100) No Terrestrial Backhaul Reporting  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	170277
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<039>	Contact Email Address - Email Address of person identified in data line <030>	lhindman@westsidetel.com

<1100> Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

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**(1200) Terms and Condition for Lifeline Customers**  
**Lifeline**  
**Data Collection Form**

FCC Form 481  
 OMB Control No. 3060-0986/OMB Control No. 3060-0819  
 July 2013

<010>	Study Area Code	170277
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<020>	Program Year	2018
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<039>	Contact Email Address - Email Address of person identified in data line <030>	lhindman@westsidetel.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

170277pa1210.pdf

Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒

<1222> Details on the number of minutes provided as part of the plan, ☒

<1223> Additional charges for toll calls, and rates for each such plan. ☒

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(2005) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	170277
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<039>	Contact Email Address - Email Address of person identified in data line <030>	lhindman@westsidetel.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

<2011>	3rd Year Certification 47 CFR §54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.		
<2022>	Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.		
<2023>	The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year three - 54.313(b)(2)(ii). Round 2 recipients only.		
<2024A>	Round 2 Recipient of Incremental Support?		
<2024B>	Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(ii). Round 2 recipients only.	Name of Attached Document Listing Required Information	
<2025A>	Round 2 Recipient of Incremental Support?		
<2025B>	Attach geocoded Information for Phase I milestone reports (Round 2 for year three) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).	Name of Attached Document Listing Required Information	
<2015>	2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)		

**(2005) Price Cap Carrier Additional Documentation**

**Data Collection Form**

*Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

**Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}**

<2016> Certification support used to build broadband

**Connect America Phase II Reporting {47 CFR § 54.313(e)}**

<2017A> Connect America Fund Phase II recipient?

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

Name of Attached Document Listing  
Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)



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<039>	Contact Email Address - Email Address of person identified in data line <030>	lhindman@westsidetel.com

Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)	Yes - Attach Certification	
(3010A)	Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}		170277pa3010.pdf
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community Anchors	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	<input type="radio"/> <input checked="" type="radio"/>
	Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:		
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		<input type="checkbox"/>
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
	If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:		
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input checked="" type="checkbox"/>
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input checked="" type="checkbox"/>
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.		<input checked="" type="checkbox"/>
	If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:		
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input type="checkbox"/>
(3023)	Underlying information subjected to a review by an independent certified public accountant		<input type="checkbox"/>
(3024)	Underlying information subjected to an officer certification.		<input type="checkbox"/>
(3025)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	170277pa3026.pdf

(3005) Rate Of Return Carrier Additional Documentation (Continued)

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	lhindman@westsidetel.com

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends



<b>(4005) Rural Broadband Experiment Additional Documentation</b> <b>Data Collection Form</b>	<b>FCC Form 481</b> <b>OMB Control No. 3060-0986/OMB Control No. 3060-0819</b> <b>July 2013</b>
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<010>	Study Area Code	170277
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4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.	Name of Attached Document Listing Required Information	
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Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.	Name of Attached Document Listing Required Information	
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4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.	Name of Attached Document Listing Required Information	
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<b>Certification - Reporting Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	170277
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<039>	Contact Email Address - Email Address of person identified in data line <030>	lhindman@westsidetel.com

**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:**

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

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<b>Certification - Agent / Carrier</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	170277
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<039> Contact Email Address - Email Address of person identified in data line <030>	lhindman@westsidetel.com

**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:**

<b>Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier</b>	
I certify that (Name of Agent) <u>JSI</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: <u>JSI</u>	
Name of Reporting Carrier: <u>WEST SIDE TEL CO-PA</u>	
Signature of Authorized Officer: <u>CERTIFIED ONLINE</u>	Date: <u>06/27/2017</u>
Printed name of Authorized Officer: <u>John Ludenia</u>	
Title or position of Authorized Officer: <u>Vice President &amp; General Manager</u>	
Telephone number of Authorized Officer: <u>3049838642 ext.</u>	
Study Area Code of Reporting Carrier: <u>170277</u>	Filing Due Date for this form: <u>07/03/2017</u>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**TO BE COMPLETED BY THE AUTHORIZED AGENT:**

<b>Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier</b>	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: <u>WEST SIDE TEL CO-PA</u>	
Name of Authorized Agent Firm: <u>JSI</u>	
Signature of Authorized Agent or Employee of Agent: <u>CERTIFIED ONLINE</u>	Date: <u>06/22/2017</u>
Name of Authorized Agent Employee: <u>JSI</u>	
Title or position of Authorized Agent or Employee of Agent: <u>Consultant</u>	
Telephone number of Authorized Agent or Employee of Agent: <u>5123380473 ext.</u>	
Study Area Code of Reporting Carrier: <u>170277</u>	Filing Due Date for this form: <u>07/03/2017</u>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

## Attachments

**West Side Telephone Company – Pennsylvania**

**Study Area Code: 170277**

**Response to Lines 510 - Service Quality Standards and Consumer Protection Rules**

**Compliance for Voice & Broadband**

In establishing this certification in its *2005 ETC Order*,<sup>1</sup> the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”<sup>2</sup> The FCC found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement” and that the sufficiency of other commitments would be considered on a case-by-case basis.<sup>3</sup> In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”<sup>4</sup>

West Side Telephone Company (“Company”) hereby certifies that it complies with applicable service quality standards and consumer protection rules and related services sourcing rule as established by the Pennsylvania Public Utility Commission. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff which discloses rates, terms and conditions of service to customers; (2) adherence to state consumer protection requirements governing telephone providers; and (3) service quality standards requirements and actions as

<sup>1</sup> *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

<sup>2</sup> *Id.* at para. 28.

<sup>3</sup> *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

<sup>4</sup> *Id.* at n. 72.

identified in 52 Pa. Code § 63, Subchapter E (Telephone Quality Service Standards) and reporting of corrective action under 52 Pa. Code §§ 63.51-63.65. Further, the Company complies with Cyber Security Planning to maintain security for its infrastructure as required in 52 Pa. Code §§ 101.1-101.7. For service outages, the company complies with 52 Pa. Code §67.1 regarding the reporting of service interruptions which reach a state-defined threshold.

In addition, the Company complies with numerous federal consumer protection standards including, but not limited to: (1) Truth-in-Billing Rules outlined in 47 CFR § 64.2401; and (2) compliance with Federal CPNI rules, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

For its broadband service, the Company hereby certifies that while there are no applicable state broadband service quality standards and consumer protection rules yet established under Pennsylvania statutes, the Company discloses rates, terms and conditions on its public web site and the Company complies with applicable federal and state customer protection standards generally applicable to all businesses operating in Pennsylvania. In addition, the Company adheres to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the *2015 Open Internet Order*, as it applies to the Company.



**West Side Telephone Company – Pennsylvania**

**Study Area Code: 170277**

**Response to Lines 610 - Ability to Function in Emergency Situations, Voice and  
Broadband**

West Side Telephone Company (“Company”) hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2)<sup>1</sup> and the West Side Administrative Code. The Company’s network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations also allows the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, the Company is able to function under emergency operations in accordance with § 63.14 as established by the Pennsylvania Utility Commission which include obligations for continuity of service and emergency operations planning and service provision capability for dominant carriers. Reserve equipment includes a minimum of 3 hours battery reserve for central offices equipped with permanently installed standby power facilities. Central offices have adequate provisions for standby power. Exchanges exceeding 5,000 lines shall be equipped with stationary standby power facilities. Company exchanges do have installed stationery power,

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<sup>1</sup> Section 54.202(a)(2) requires ETCs that are designated by the Commission to “demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.”

however, they do not exceed the 5,000 line threshold and therefore do not have permanent auxiliary power.

The Company's standby generators and battery back-up equipment support both voice and broadband network equipment in the event of an emergency situation.

REDACTED FOR PUBLIC INSPECTION

**(700) Price Offerings including Voice Rate Data  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	170277
<015>	Study Area Name	WEST SIDE TEL CO-PA
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Lori Hindman
<035>	Contact Telephone Number - Number of person identified in data line <030>	3049838611 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lhindman@westsidetel.com

<701> Residential Local Service Charge Effective Date

1/1/2017

<702> Single State-wide Residential Local Service Charge

<703>

[illegible]

REDACTED FOR PUBLIC INSPECTION

<b>(710) Broadband Price Offerings</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	170277
<015>	Study Area Name	WEST SIDE TEL CO-PA
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Lori Hindman
<035>	Contact Telephone Number - Number of person identified in data line <030>	3049838611 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lhindman@westsidetel.com

[illegible]

REDACTED FOR PUBLIC INSPECTION

<b>(800) Operating Companies</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	170277
<015>	Study Area Name	WEST SIDE TEL CO-PA
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Lori Hindman
<035>	Contact Telephone Number - Number of person identified in data line <030>	3049838611 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lhindman@westsidetel.com
<810>	Reporting Carrier	West Side Telephone Company
<811>	Holding Company	TelAtlantic, Inc.
<812>	Operating Company	West Side Telephone Company

[illegible]

**West Side (PA) Telephone Company**

**Study Area Code: 170277**

**Rates, Terms and Conditions for Lifeline Service**

**(Response to Form 481, Line 1210)**

Local exchange service rates and charges as specified below are for basic local exchange service, including Tone Dialing Service, and facilities only. The rates for other ancillary services not specifically shown below are presented in West Side (PA) Telephone Company's tariff(s) on file with the Pennsylvania Public Utility Commission. Unless otherwise specified, the rates and charges quoted below are for a period of one month, payable in advance and provide unlimited flat rate calling within the local exchange calling scope.

Residential Local Exchange Access Line Rates are provided in Line 700 included herein this ETC Annual Report. The residential local service rates listed in Line 700 do not include all mandatory taxes, fees and surcharges, including, but not limited to, state and local taxes, 9-1-1 fees and municipal franchise fees. Qualified Lifeline customers are eligible for Lifeline credits or discounts as outlined in the attached Lifeline tariff.

West Side Telephone Company DBA  
West Side Telecommunications

Section 14  
Fourth Revised Sheet 1  
Cancels Third Revised Sheet 1

## S14. LIFELINE SERVICE

### S14.1 Description

Lifeline Service is a federally funded program established to provide monthly assistance to residential low income households who qualify for this service in accordance with the following Regulations.

### S14.2 Regulations

1. Lifeline Service is available to qualified customers and is provided via a residence individual Dial Tone Line. Lifeline Service is limited to only one Service per qualified customer or household (a household is defined as “any individual or group of individuals who are living together as one economic unit” an economic unit is “all adult individuals contributing to and sharing in the income and expenses of a household”). However, a qualified residence customer or household is not eligible for Lifeline Service if they are currently receiving a Lifeline program discount on another service supported by the Federal Communications Commission. A potential Lifeline customer who has an outstanding final bill for telephone service which is less than (4) years old must pay the entire balance of any Basic Service final bill before being eligible for Lifeline Service. (C)
2. Residence Lifeline Service consists of the following tariffed standard features and optional customer elected services at the applicable rates, charges and regulations for each feature and service provided.
  - a. One-Party Residence Line Rate or Local Measured Service Option.
  - b. Directory Listing (standard only).
  - c. Non-Published or Non-Listed Telephone Number Service.
  - d. Access to Directory Assistance Service.
  - e. Touch-Tone Calling Service.
  - f. Access to Message Toll Telephone Service and Optional Dial Station-to-Station Calling Plan Services. However, the Residence Lifeline Dial Tone Line will be blocked from dial station access to 976/556/900 and any other type of Audiotex Service.
  - g. Access to Operator Services.
  - h. Voluntary Toll Restriction Option.
  - i. Access to 800/888 Services.
  - j. Access to Call Trace.
  - k. Access to Alerting and Reporting Systems (9-1-1 dialing).
  - l. Access to the Pennsylvania Telecommunications Relay Service.
  - m. Caller ID Per-call and Per-line Blocking.
  - n. Other eligible telecommunications services at tariffed rates.

(C) Indicates Change

West Side Telephone Company DBA  
West Side Telecommunications

Section 14  
Sixth Revised Sheet 2  
Cancels Fifth Revised Sheet 2

## S14. LIFELINE SERVICE

### S14.2 Regulations (continued)

3. An applicant for Lifeline Service must be a current participant in one of the following Pennsylvania programs, or be able to provide proof of household income which is at or below 135% of the annual Federal Poverty Guidelines for all States (except Alaska and Hawaii) and the District of Columbia. Recertification of Lifeline Service participants must be conducted annually by West Side Telecommunications to ensure continued eligibility. Lifeline customers have the responsibility to notify the Telephone Company within thirty (30) days of a change in eligibility status if they no longer qualify for Lifeline Service.

Pennsylvania Department of Human Services (DHS) Programs:

\* \* \*

Supplemental Security Income (SSI)

Medicaid

Supplemental Nutrition Assistance Program (SNAP) (f/k/a Food Stamps)

\* \* \*

Additional Eligible Programs (Federal)

Federal Public Housing

\* \* \*

Veteran's Pension or Survivor's Pension Benefit

The DHS Programs listed above must be certified by DHS. Such certification by DHS will be provided only when a DHS client requests Lifeline Service based on the client's status as a participant in any of the above eligibility programs. Certification by DHS will be limited to confirmation of the client's program status (i.e., participation or non-participation). Participation by DHS is subject to execution of an agreement with DHS and West Side Telecommunications.

4. Lifeline Service will be provided to a customer only so long as such customer continues to meet the participation and certification guidelines in S14.2 (3) above. At the time of initial establishment of Lifeline Service, the customer agrees to have his or her eligibility recertified annually by West Side Telecommunications. When West Side Telecommunications is notified by the customer or determines through recertification that the Lifeline Service customer is no longer a participant in the DHS programs in S14.2 (3) above or otherwise low-income eligible, the customer will be notified (by telephone or letter) that the Lifeline Service rate is no longer applicable. Within the stated customer notification period (60 days from the date of the notification), the customer can contact the Company to negotiate new Dial

(C) Indicates Change



West Side Telephone Company DBA  
West Side Telecommunications

Section 14  
Fourth Revised Sheet 3  
Cancels Third Revised Sheet 3

## S14. LIFELINE SERVICE

### S14.2 Regulations (continued)

Tone Service arrangements at applicable tariff rates (no connection charges will apply for existing services or options retained). If the customer does not contact the Company by the end of the notification period, the Lifeline Service will be changed to applicable Exchange Area Dial Tone Line service at existing tariff rates (no connections charges will apply to existing services or options retained).

5. A Lifeline Service customer may not subscribe to any other type of residence Local Exchange Service at the same or other premises. Lifeline Service will not be provided via Foreign Exchange or Foreign Central Office Service arrangements.
6. Only services listed in S14.2 (2) above will be provided to Lifeline customers.
7. Customer requested temporary suspension of Lifeline Service is not permitted.
8. Lifeline Service does not apply to applicants who are full time students living in university or college controlled housing.
- \* \* \*
9. Lifeline customers are subject to all Residence service regulations in this and other tariffs of West Side Telecommunications.

(C)

(C) Indicates Change

West Side Telephone Company DBA  
West Side Telecommunications

Section 14  
Third Revised Sheet 4  
Cancels Second Revised Sheet 4

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#### S14. LIFELINE SERVICE

##### S14.2 Regulations (continued)

10. Residence Lifeline Service cannot be resold by the Lifeline customer or the Lifeline customers' agent(s). (C)
- \* \* \*
11. All outstanding charges, account balances and service restrictions apply to existing customers who qualify for Lifetime Service. Service restrictions will remain until the arrearage(s) have been paid in full.
12. Any Lifeline customer who has a past due balance of Toll charges will be treated with the appropriate Chapter 64 regulations. The Residence Toll Restoral Charge applies to Lifeline Customers who are suspended for non-payment and who subsequently pay their outstanding toll charges and request toll restoral. If a Lifeline customer is toll restricted for a second occurrence the Company may, at its discretion, place the Lifeline customer on permanent toll restriction.
13. Toll-Blocking and Toll-Control services will be provided at no charge to Lifeline Service subscribers, to the extent that they are offered.

(C) Indicates Change

**West Side Telephone Company – Pennsylvania**

**Study Area Code: 170277**

**Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))**

West Side Telephone Company - Pennsylvania (“Company”) hereby certifies that throughout 2016, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas and that requests for such service are met within a reasonable amount of time. If a request for broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream is unreasonable, the Company offers broadband service at the highest available speed.

**REDACTED – FOR PUBLIC INSPECTION**

**ATTACHMENT - LINE 3026**

**ATTACHMENT REDACTED IN ENTIRETY**